200,096

"Andrew Shepard" <usa_go@hotmail.com >

05/04/2003 01:35 PM

To: wymail_jmhcap@blm.gov
cc:
Subject: "Citizens Alternative" plan, Jack Morrow Hills

To: Renee Dana, BLM
Rock Springs Field Office

I strongly feel the Bureau of Land Management should go with the Citizens' Wildlife and Wildlands alternative for the Jack Morrow Hills. I used to live in the West and particularly care about damage to the Wyoming landscape which your White House-inspired plan would impose from outside, as well as the historical implications, and effects on the Shoshones. Development within sight of the Honeycomb Buttes or Killpecker Dunes? Don't even think of it. Drilling rigs in the red desert is a particularly unacceptable use of our land.

Sincerely,
Andrew Shepard, 21-07 Radburn Road, Fair Lawn NJ 07410

200,145

MARRSPHOTO@aol.com
05/19/2003 08:52 AM

To: wymail_jmhcap@blm.gov
cc:
Subject: Fwd: RED DESERT AND JACK MORROW HILLS

----- Message from MARRSPHOTO@aol.com on Sun, 18 May 2003 21:47:02 EDT -----

To: wymail_jmhcap@blm_gov

Subject RED DESERT AND JACK MORROW
: HILLS

Renee Dana;

The Red Desert, Boars Tusk area and Jack Morrow Hills are areas that need protection from over drilling and over use of recreation vehicles. Wyoming has long been a State that has been taken advantage of, because of our low population, a weak voice in Washington, poor management of the land and abuse by it's own citizens.

Please consider placing a moratorium on the Great Divide Basin area to any further oil and gas development and consider banning all forms of ATV's from the entire area.

Thank you for the attention given this request.

Graig Marrs
2100 Park Avenue
Cheyenne, Wyoming 82007

200,146

Jazmyn McDonald
<jzmc@wyoming.com>
05/19/2003 09:34 AM

To: wymail_jmhcap@blm.gov
cc: Gale_Norton@ios.doi.gov, governor@missc.state.wy.us
Subject: Jack Morrow Hills supplemental plan

RE: Support Jack Morrow Hills Citizens' Wildlife & Wildlands Alternative

I would like to register my support for the Citizens' Wildlife and Wildlands Alternative for the Jack Morrow Hills Study Area.

I had occasion to drive down through the Red Desert on Hwy 28 last week and was reminded of how very fragile and what very unusual requirements that area has. It is as you know a high desert, undergoing its fifth year of severe drought, which only makes clearer the vulnerability of the plants and animals who live there; and how dependent they are on minimal disturbance to that area.

I also had occasion to observe as I drove on south of Farson last week a brown layer of haze to the south and west. I have watched with some concern as this haze seems to be becoming a permanent feature of our Wyoming horizon in the SW; and as it expands in relation to the development of the oil and gas fields. Since we in Wyoming strive to maintain pristine air quality, I urge you in particular to prohibit all new oil and gas leases in the Jack Morrow Hills.

As a resident of Fremont County, finally I urge you to take into account the economics of recreational use of this area. Longterm sustainable tourism and local recreation in this area offers an annual income of some three million dollars to our state; contrast this to the oil and gas industry estimates of maybe a payroll of two million for maybe 25 years. And finally, with gas prices dropping, and an enormous new source of oil opening up in Iraq, why go after such a marginally profitable area?

Thank you for your hard work on this plan.

Sincerely,

Jazmyn McDonald

PO Box 1808
Lander WY 82520 USA
307.332.3455

200,162

"John Pallesen" <johnp@swcmail.co.sweet.wy.us>
05/20/2003 08:18 AM

To: <Wymail_jmhcap@blm.gov>
cc:
Subject: Jack Morrow Hills

Please note that the preferred alterative seem like it takes into account a balance of resource and cultural uses.

With any plan, success depends on monitoring and mitigation. I feel the BLM is a little lax in this part. My comment would be to make sure the IDT is involved yearly to evaluate the success or failure of all of the parts.

We can't afford another Jonah.

200,177

"Mila Ready" <milaready@wyoming.com>
05/21/2003 04:25 PM

To: <wymail_jmhcap@blm.gov>
cc:
Subject: Supplemental Draft EIS Comment

[redacted]
PACD Technician
201 Main Street
Lander, WY 82520
(307) 332-3114

- JMH Comment.doc

Bureau of Land Management
Rock Springs Field Office
280 Highway 191 North
Rock Springs, WY 82901

May 20, 2003

To Whom It May Concern:

We wish to comment regarding the Supplemental Draft Environmental Impact Statement for the Jack Morrow Hills Coordinated Activity Plan. Both my wife and I are from fourth generation Wyoming families, and as such we hope to see the rural, agricultural character and history of this great state continue. We would also like to congratulate all of the personnel and working partners for their efforts and countless hours in creating this document. Although not perfect, this document is thorough, fair and reasonable.

As a family with deep ties to this state and also to the ranching industry we wholeheartedly support the multiple use concept inherent to management of public lands in the United States. Of course this concept includes provisions for wildlife, recreation and cultural preservation while simultaneously allowing sensible development and utilization of natural resources readily available on such lands.

This multiple use concept includes mineral development and livestock grazing. However, mineral development and livestock grazing are combined in the draft under the term "development" when these activities are separate and should have been addressed as such since extraction of oil, gas, and other minerals is a finite activity. On the other hand, grazing, when properly managed is a continuous renewable resource and should be allowed to continue in the Jack Morrow Hills.

Regardless of this oversight we support the preferred alternatives stated in the Supplemental Draft EIS because and should be followed because it adheres to the multiple use concept for management of the Jack Morrow Hills. We thank you for the opportunity to comment and participate in this process.

Sincerely,

Merrill J. and Mila M. Ready
P.O. Box 324
Hudson, WY 82515
(307) 335-8128

200,180

Barbara Wright
<bswright@sweetwater.net>

05/22/2003 10:59 AM
Please respond to
bswright

To: wymail_jmhcap@blm.gov
cc:
Subject: Jack Morrow Hills Comments

Gentlemen:

We would request consideration for allowing recreational prospecting in this area, especially near the South Pass section. We would also like to be able to do metal detecting and rock hounding activities around the Kinney rim and other sections in this area. My husband is involved in oil and gas exploration work and we are in favor of mineral exploration throughout the Jack Marrow Hills. From our observations of the mineral explorations undertaken near Pinedale, we do not believe this will adversely affect wildlife. In fact we have seen more antelope around current well fields than in other areas, especially during the current drought conditions. We would like to see roadway access available for hunting, in season, and for off road activities including ATV access. It is our opinion that the best program for this area is continued multi-use so that more of our citizens can use it for recreational activities and as a means of providing a living in this area. We believe the majority of people who use public lands are responsible citizens willing to cooperate to maintain its unique status.

Thank you for your consideration,

Barbara S. Wright
Wilbert E. Wright
326 Folsom Drive
Rock Springs, WY 82901

200,201

"Deena McMullen" <dmcmullen@ipams.org>
05/23/2003 10:34 AM
Please respond to dmcmullen

To: <wymail_jmhcap@blm.gov>
cc:
Subject: JMH CAP DEIS Comments - IPAMS

Please find below and attached, IPAMS comments on the JMH CAP DEIS. If you are unable to open the document, please let me know. Thank you.

Deena

May 23, 2003

Jack Morrow Hills CAP Team Leader
Bureau of Land Management
280 Highway 191 North
Rock Springs, WY 82901-3447

RE: Comments on Jack Morrow Hills Coordinated Activity Plan Supplemental Draft Environmental Impact Statement

Dear Ladies and Gentlemen:

These comments are submitted on behalf of the Independent Petroleum Association of Mountain States (IPAMS). IPAMS is the regional trade association in the Inter-Mountain West representing the interests of over 350 independent natural gas and oil producers, royalty owners, industry consultants, and service and supply companies operating in thirteen-states including Wyoming. Independent producers drill 85 percent of the wells in the United States, produce 65 percent of the country's natural gas, and 40 percent of the oil. IPAMS appreciates the opportunity to comment on the Jack Morrow Hills Coordinated Activity Plan Supplemental Draft Environmental Impact Statement (SDEIS) and respectfully requests that the BLM consider the following comments.

President's Executive Order 13212

The BLM must follow the President's Executive Order 13212 (2001) in completion of the JMH SDEIS. In the Executive Order, the President directs federal agencies to evaluate current programs, policies and rules and to reduce barriers to America's energy self-sufficiency. The SDEIS should reflect federal law and policy and the nation's need for secure sources of domestic energy. The SDEIS should acknowledge that industry can develop the resources in an environmentally friendly manner while providing the nation with an abundant source of clean affordable energy. Furthermore, the BLM has a Congressionally mandated multiple-use mission, which must be honored and not compromised by the single-use land management objectives promoted by certain interest groups.

Adaptive Management

IPAMS recognizes that the concept of adaptive management could be a useful tool in the planning process, if implemented correctly. IPAMS supports specific performance based guidelines to ensure that project proponents fully understand the expectations at the time a permit is issued. We do not agree with adaptive management that is unspecified or to be determined management. This can lead to delays and further complication of compliance.

In addition, IPAMS is skeptical of the work group system that has been used in the past with adaptive management. These work groups often involve

individuals who hold very little technical or environmental knowledge. Any work group associated with adaptive management must possess a scientific and working knowledge of any issue being addressed.

Phased Leasing and Development

In theory phased development sounds like a reasonable plan that could be implemented quickly, this is simply not true. In practice phased development is another restrictive management plan that will have detrimental effects on the industry and the economy of the state of Wyoming.

We have a shortage of natural gas and we should not limit exploration and development to certain areas before exploring or developing a new area. Storage levels are at an all time low and limiting production to phased areas will not put enough production on line to meet the demand.

Phased leasing and development reduces the ability of companies to drill exploratory wells within a resource area. If lease sales are limited to set phase areas, effectively the amount of leases is severely restricted, which could lead to the smaller independent companies being forced out of an area.

Directional Drilling

BLM must not make assumptions that industry can directionally drill in any situation. Increased cost coupled with increased mechanical challenges may prevent directional projects from ever being drilled and thus related revenues not realized by the state of Wyoming and the country.

Wildlife

When developing management practices and wildlife stipulations, the BLM should use sound science to determine wildlife patterns and whether restrictions are necessary. Too often, areas are closed or severely restricted based on faulty evidence. The BLM should assimilate and analyze all previously collected data for wildlife resources and adjust mitigation as appropriate. It is important that science not scare tactics are used to ensure safety of the environment.

Conclusion

Environmentally responsible development of natural gas and oil resources in the Jack Morrow Hills Coordinated activity plan area will provide significant benefits to local communities, the state, and the nation. To successfully develop the resources in the area, all parties must work together to establish reasonable multiple use alternatives that will provide environmentally sound development of natural resources and minimize any impacts on wildlife, plants, and recreational interests.

IPAMS urges the BLM to move expeditiously to complete this revision, avoiding all unnecessary delays, so that the nation, state, and county can continue to reap the benefits of multiple-use provided in this area.

IPAMS looks forward to continuing to cooperate with the BLM and work with all stakeholders to develop energy for the nation while protecting the environment. If you have any questions, please contact [redacted], IPAMS at 303-623-0987. Thanks again for the opportunity to comment on this document.

Sincerely,

[redacted]
Manager of Government and Public Affairs

[redacted]
Manager of Government & Public Affairs
MT, WY, ND, SD
Independent Petroleum Association of
Mountain States

518 17th Street, Suite 620
Denver, CO 80202
303-623-0987
303-893-0709 FAX

http://www.ipams.org

 - winmail.dat

200,206

Warren Ulmer <wulmer@wyoming.com>
05/23/2003 01:29 PM

To: wymail_jmhcap@blm.gov
cc:
Subject: Jack Morrow Hills Comments

I wish to make comments as a Wyoming citizen, as well as a professional meteorologist and atmospheric chemist. Since I am the only atmospheric chemist in the geographic area and am working on air pollution in a nearby basin (The Wind River Basin), I bring some professional expertise to the table. Therefore, I wish to make some comments on the Jack Morrow Hills (JMH) proposed development.

Air quality regulations referenced in Appendix 15 do not specifically address any issues specific to the Red Desert Basin. The reference to criteria pollutants (CO, PM2.5-10, NO2, O3, HAPS, Pb, and SO2) are only made reference to in regulations and not detailed. Moreover, data from the NADP and CASTNet sites in the Pinedale area and specifiically the Pinedale Anticline Project, are not representative of pollution loading in the Jack Morrow Hills area. Although data is sparse to non-existant in the Red Desert area (Great Divide Basin) of concern, there was an atmospheric modeling study done in the vicinity (http://deq.state.wy.us/aqd/index.asp?pageid=132). Data for the Southwest Wyoming Technical Air Forum (SWWYTAF) models included NADP, CASTNet, and IMPROVE values. Deposition values from Pinedale, Sinks Canyon, South Pass and Gypsum Creek were also used.

Although I have been a vocal opponent of the CALPUFF model used (a localized Los Angeles Basin model extrapolated to a tri-state area regional model) in the SWWYTAF study, some valid conclusions can be made. Namely, that regional haze from Utah, and the Great Divide Basin is swept into the Little Colorado Desert where the parcel of air of concern continues its travels past Big Piney and Pinedale to the basin head in the Bridger Teton National Forest. This parcel must exit the Green River Headwaters over Union Pass due to the conservation of mass principle. The strong, warm winds in the Dubois area area are representative of this exiting mass and adiabatic compression. The exiting parcel is then distributed in the Upper Wind River Basin.

The SWWYTAF did not use a full Lagrangian model and relied on a much simpler Eulerian model that did not take into account the complex air chemistry that occurs within the parcel itself. Eulerian models can be used for trajectory analysis, but cannot be used for understanding atmospheric chemistry. However, simple aerosol particle chemistry may be understood.

This channeling of air is similar to the studies of the Snake River Basin in Idaho (see Idaho Field Experiment 1981 NUREG/CR-3488) conducted by the NOAA Air Resources Laboratory Field Research Division in Idaho Falls where I was a visiting scientist. However, studies conducted in the Snake River Basin used SF6 tracers with aircraft samplers, wind profilers, SODAR, tall instrumented towers, tetroons (constant density following balloons) as well as other instrumentation in the basin. This experiment has been repeated several times, with similar results in each experiment. However, the distinction to be made is that real data was used in Idaho compared to a fundamentally flawed (data and modeling) study (SWWYTAF) in Wyoming that used very little real data.

The data used in SWWYTAF and data referenced in the Jack Morrow Hills Supplemental Draft EIS and the SWWYTAF is suspect. For instance the

IMPROVE data used is sampled at approximately the same level (approximately 2500m). A vertical profile of the atmosphere from below sample sites to a geostrophic level (where frictional forces from terrain are minimalized) of approximately 4500-5000m was not used. The IMPROVE data details pollution at 2500m level and does not show vertical variation. An example of this is in the Los Angeles Basin where air acid induced vegetation stunting shows shows a distinct line (much like a flood line on buildings) where inversions kept pollution mostly below that visible level. As most Wyomingites know, the Big Piney area is the coldest area in the state due to wintertime gravity currents in the surrounding mountains depositing cold air at night in the basin. However, air above 200m over Big Piney is relatively warm with air masses still exiting the Upper Green River Basin. The point is that the atmosphere has many vertically stacked levels that are interdependent of each other at times, and interrelated at other times. Single level sampling does not constitute a comprehensive study.

Specific, to the Red Desert area of the Great Divide Basin, very little is known about the meteorology there. The SWWYTAF model included emissions data from the Jim Bridger Plant in Superior which is located on the western margin of the Red Desert. The "core area" of the Jack Morrow Hills which encompasses the Steamboat Mountain ACEC and Buffalo Hump WSA is under the influence of the Jim Bridger coal fired power plant (JBP). However, emissions from JBP are not so easily to discern. During strong zonal flow conditions (West to East winds), JBP and PM emissions from the surrounding area typically move down the Interstate 80 corridor towards Rawlins. During SW wind events the JBP emissions and regional emissions from Utah pass over the JMH. To further compound matters the Red Desert Basin is a hydrologically enclosed basin and MAY BE an enclosed basin for atmospheric constituents near ground levels. My professional opinion is that the Shamrock Hills in the eastern Great Divide Basin are an impediment to low velocity zonal flows and keep the air masses from exiting the basin. Likewise the Green Mountains and Ferris Mountains are impediments to northeast exiting air masses. Moreover, the rare event southerly winds are blocked by the southern edge of the Wind River Mountains. Easterly winds during strong spring snow events tend to flush out the basin. However, this retrograde easterly wind soon relaxes and air parcels move in the more frequent north to northeast direction.

The specific questions to ask from proposed development are: 1) What would the emissions in the JMH's area be from development? 2) Would these emissions be contained within the basin or be transported to other areas? 3) Would present emissions from the JBP and region be much larger that subsequent emissions from JMHs development, and therefore could be considered insignificant?

I would like to address these questions individually.

1) What would the emissions in the JMH's area be from development? My initial concern is not the HAPs, CO, NOx, and sulfur species emissions from development. Yes, there will be these type of emissions from drilling and other infrastructure such as compression stations. With proper best available technology (BAT) methods these emissions can be minimized. With care and continuous BAT updates if the project commences, these emissions can be minimized. However, my main concern is with PM (particulate matter) emissions from roads.

Road emissions can also be categorized by the type of roadbed used. Obviously, limestone or granitic gravel decompose at different rates and assembly into very different aerosol size distributions. Limestone particle atmospheric chemistry is much different than clay or granitic

chemistry. Limestone does mitigate acid rain but has to be moist to do so. Preliminary research studies have indicated that Green River Basin soils do mitigate acid rain in the Wind River Mountains. However, would increased limestone emissions contribute to a large degree the total moderation of acid rain? This question has not been answered. Limestone road-bedding would tend to make smaller particles versus larger particles for granitic materials.

Many people have read in newspapers that dust from the Gobi Desert has been measured in Texas. How can these particles move this far? Deposition rates are directly proportional to particle size and the kinetic energy of the surrounding air. In other words, large particles generally don't travel far, and likewise slow wind velocities don't move particles very far. When particles are moved by motor vehicles disturbing them or through direct action of the wind, these particles rub against each other and in the case of a dry atmosphere are reduced in size. The deliquescence (bloating) process is only of concern in a moist atmosphere which is usually not present in the JMHs. However, when the dust particles reach a certain size distribution a particle-to-gas or a gas-to-particle conversion may take place. This is where aerosol and atmospheric chemistry are interrelated. Therefore, wet and dry deposition are important. Because of the complexity of these processes, a log-normal distribution is assumed for various regimes in simple models. Power-law distribution, modified gamma distribution, and remote continental distributions can also be used. Some measured distributions in a desert atmosphere show tri-modal or even more complex distributions. Because of many size particle distributions, clearly defined regimes are used to simplify matters. For EPA and WYDEQ purposes, only 2.5 micrometer and 10 micrometer distributions are used. The EPA is in the process of measuring an intermediate value which may be more indicative of haze that humans can see. We are definitely seeing increasing haze throughout Wyoming.

WYDEQ measurements of PM10 in the Powder River Basin has been consistently above regulated values due to roads linking coal bed methane wells. Likewise, the Pinedale Anticline and other gas field projects in the area have also exceeded regulated values. Using potassium chloride and other road treatments have somewhat mitigated dust problems, but still have not markedly cleaned up the air in the Gillette area.

2) Would these emissions be contained within the basin or be transported to other areas?

This question is the great unknown. Trajectory analysis in computer models can give us an idea, but real measured knowledge is needed. The computer models used and lack of collected or measured data have not done much to settle this question. My profession opinion is that larger (i.e. 10 micrometer) particles are probably contained within the basin. Smaller particles (i.e. around 5 micrometers) are probably mixed throughout the basin, and some particles being exported to other basins. The 1 micrometer and smaller particles are probably undergoing complex processes that are poorly understood. (Jaenicke, 1993, in Aerosol-Cloud-Climate Interactions) has suggested a tri-modal distribution with particles smaller than 2.5 micrometers contribute 40-80% of collected PM10 mass in an interior continental atmosphere. (Li, et a., 1996, Nature) also suggest a tri-modal distribution in desert atmospheres with modes being strongly correlated to wind velocity. Also of consequence is the disturbance of fragile soils to future emissions. When drill rigs and roads are established, a large amount of soil is made unstable and is subsequently transported into

the atmosphere.

3) Would present emissions from the JBP and region be much larger that subsequent emissions from JMHs development, and therefore could be considered insignificant?

This question cannot be adequately addressed due to lack of data. There has not been any background measurements at all within the Great Divide Basin. Until present background values are measured a conclusion cannot be drawn.

Recommendations:
There is very little understanding of the meteorology or atmospheric chemistry of the JMHs. Sampling stations for PM2.5 and PM10 need to be set in place. Several meteorological stations that include U-V-W (vertical measuring winds sensors) need to be put in the area for input into atmospheric models. I believe NOx, CO and other common gasses from proposed development would probably not need to be measured as they are most likely insignificant. Also gases would be exported to other regions and probably not impair visual values. A tracer study might also be of value for real trajectory analysis. Temporal and spatial values are sorely lacking.

It is my personal opinion that we do not know enough about the area to allow immediate development. The gas under the ground will not go anywhere if development is not made. We can afford to measure first and develop later if the development is warranted. It is not worth the chance of loosing a precious resource as the JHMs to satisfy a shortime greed for gas. I suppose the Citizen's Conservation Alternative.

Warren C. Ulmer
Consultant-Wyoming Atmospheric Research
50 Field Station Road
Lander, WY 82520
307.332.4079
wulmer@wyoming.com

200,209

steven amstrup <samstrup2@yahoo.com>
05/23/2003 02:47 PM

To: Wymail_jmhcap@blm.gov
cc:
Subject: Comments on SDEIS

Below you will find my comments on the JMH SDEIS. The comments also are attached as a MSWord document which may be easier to read than the email text.

I also attempted to submit these comments to your web site. Because my comments are written in the form of a letter, and your web site wanted partitioned comments, it wasn't clear to me that the Web submission was very successful.

The comments attached and below may be easier to read and interpret.

Thank you for the opportunity to participate in the public comment process. SCA

From:
Steven C. Amstrup
1112 West 15th Ave
Anchorage, AK, 99501
907-278-9912
To:
Bureau of Land Management,
280 Highway 191 North,
Rock Springs, Wyoming, 82901

Attn: Jack Morrow Hills CAP Leader

I am writing to provide feedback on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Jack Morrow Hills (JMH) Coordinated Activity Plan (CAP).
I first want to thank you for providing the public the opportunity to comment on management decisions related to our public lands. It is clear that a great deal of work went into producing this SDEIS and associated documents and you are to be commended for those efforts. The job of managing public resources is guaranteed to be difficult and BLM will never please everybody. But, of course, pleasing everybody is not the job of BLM. Rather, the job of BLM is to be the best possible steward of our public land heritage. Part of that stewardship is public participation. I hope my participation in that public process will help you achieve the most effective stewardship of the JMH area.
MY BACKGROUND
I am a PhD wildlife ecologist with 30 years experience working on topics related to energy development. I am a strong believer in multiple-use of public lands, stewardship as opposed to simple protection, and utilization of multiple management tools to achieve that stewardship. I recognize that until we make the necessary shift to an economy based upon hydrogen and other alternative energy sources, we will continue to need hydrocarbons. I believe that most hydrocarbon extraction prospects can be managed in ways that minimize impacts on other resources in the area. I

also recognize that all hydrocarbon prospects are not created equal, neither in terms of their value nor in the total costs of acquiring them. I also recognize that we haven't always done well in managing hydrocarbon acquisition. My wife and I own property and plan to retire in Fremont County, just a few miles from the JMH. Because the area covered in this SDEIS is literally in my back yard, I want to do what I can to assure management there is the best it can be. The comments I provide here are my own alone, and have nothing to do with my employer or other organizations of which I may be a member.

MY CONCLUSION:

After reviewing the SDEIS, I have concluded that Alternative #2 is the most desirable alternative action you have outlined, and I strongly urge you to implement that management strategy for JMH. Although your SDEIS suggests another alternative management plan is "preferred", I do not find your arguments, supporting preferred status of that alternative, compelling. Therefore, I urge you to adopt Alternative #2 instead. A summary of the reasons I feel this way follows.

SUPPORT FOR MY CONCLUSION

As you know, there are no longer any "non-controversial" energy developments. Our increasing and increasingly mobile human population continues to create demand for hydrocarbons at the same time that concerns about healthy landscapes and "quality of life" are escalating. As stewards of the public land heritage, you must deal with the conflicting pressures on our landscapes by considering every energy development prospect from a cost and benefit standpoint. It is important that all the costs (including possible losses of the hard to evaluate wildlife, recreation, scenic, and other quality of life values) and all the benefits be considered. It is also imperative that all the costs be considered in national as well as regional and local contexts. Hence you must look at the jobs, revenue, and hydrocarbons that could be produced under your various JMH alternatives (and the total risks of those production scenarios) in comparison to the other possible sources of hydrocarbons in Wyoming (such as the Powder River Basin CBM) and across the nation (e.g. the National Petroleum Reserve Alaska, or the Arctic National Wildlife Refuge). With such a review, some energy reserves will stand out as "crown jewels" of our energy heritage. Others will clearly be lower priority developments because of their commanding competitive values (e.g. historic, wildlife, scenic), lower energy/economic returns, or both.

In this context then, how do the 5 JMH alternatives you have outlined stand up? According to the language in the SDEIS (in quotes), the differences between the alternatives in terms of jobs created "would not be considered significant relative to threshold values" of the local area. The differences in earnings "would not be considered significant" because the annual increase in earnings from the most aggressive alternative (#1) "would be well below the significance criteria;" and the reduction in earnings from the least aggressive alternative (#2) "falls well within the threshold values." The whole range of projected royalty and tax revenues between the most and least

aggressive alternatives was within the "established thresholds for the area." In other words, the energy and economic gains from even the most aggressive development alternative for JMH would not "significantly" affect even the local economy. The regional and national significance of the alternatives for changing the hydrocarbon extraction procedures in JMH, therefore, must also be considered "non-significant."

If the benefits to aggressive development in JMH are non-significant, what about the environmental and quality of life costs of such developments? Here, the differences between the alternatives appear to be substantial. The bottom line is that implementation of Alternative #2 would provide substantially greater protection for the areas holding the most special, unique, and sensitive values of JMH. Whereas your "preferred alternative" proposes to afford the best care of these resources through "Adaptive Management"; the uncertainty in the level and effectiveness of that management is much greater than in alternative #2. In alternative #2, the stewardship of the special and sensitive values of JMH literally are written in black and white. In your "preferred alternative" that stewardship will be subject to the whims of: future government funding for implementation and enforcement, lawsuits and other complaints from those who will disagree about what is "adaptive", and changing philosophies of government administrators. Clearly, adaptive management must be used in most natural resource situations. Basing the whole future of the JMH on poorly defined adaptive strategies, however, does not seem optimal, in light of the presence of alternative #2. Because the energy/economic benefits of alternative #2 are, according to the SDEIS, not "significantly different" from the others and the potential risks/costs are greater, the choice is clear-Alternative #2 is preferred.

The choice is clearer still when the alternatives are framed in a national context. For example, the most aggressive alternative outlined for JMH would result in just over 2000 acres of surface disturbance. Coincidentally, this is approximately the amount of acreage that might be disturbed under the most recent proposal for development of the Arctic National Wildlife Refuge. That level of surface disturbance in ANWR, however, could result in access to one of the largest oil fields in North America (even if the lower interval estimate of reserves there is used). From an energy perspective, ANWR may be one of our crown jewels, but JMH clearly is not. From the standpoint of historic scenic, and environmental values, and from the standpoint of proximity to people who can travel there to enjoy those values, however, JMH is a jewel. Alternative #2 allows continued hydrocarbon exploration and development in areas of the Red Desert that have not been identified as holding exceptional non-consumptive or renewable resource values. It allows a 6-fold increase in the amount of surface disturbance (related to hydrocarbon development) during the first 20 years after implementation. Yet, alternative #2 assures protection of portions of the JMH that truly are (in terms of recreational, historic, scenic, and wildlife values) jewels of the West. Again, I urge you to adopt alternative #2 as

your preferred management plan.

A COUPLE DETAILS

I do not have time to comment on the many details in the SDEIS that caught my attention. Neither do you probably have time to read them all. A couple things stood out strong enough, however, I feel compelled to express them here.

First, the SDEIS does not provide any specifics regarding the scope and nature of seismic testing. Options for such testing were mentioned, and brief descriptions of the various methods provided. But the critical information about the timing, locations, and spacing of seismic grids were not even mentioned. This is a major shortcoming in the SDEIS, and makes interpretation of the possible effects of such exploration impossible. This is particularly important when it comes to 3-D seismic testing. 3-D is a wonderful tool for outlining hydrocarbon prospects. It also is a potentially very disruptive tool to wildlife and their habitats. Without knowing exactly how and when 3-D grids will be run, the impacts cannot be projected. Some places, impacts of even 3-D testing can be ameliorated with fairly simple measures. For example, on Alaska's north slope, 3-D seismic can be conducted only in late winter and spring. At that time the only wildlife species that is likely to be affected is polar bears occupying their maternal dens. Because we have explicitly identified denning habitats and the chronology of denning, it is possible to effectively eliminate effects of 3-D by requiring that surveys in areas including denning habitats be run later in the spring-after females and their cubs have emerged. The SDEIS offers no indications as to how these surveys would be managed in the complex mosaic of the JMH, and hence no opportunity for reviewers to interpret what is in store for the landscape or to make sensible comments. Regardless of the alternative you finally adopt, you will need a great deal of input to adaptively manage such surveys in the complex habitats of the JMH.

The second detail I wanted to mention relates to prescribed burns. In several locations, the SDEIS mentions the use of prescribed burns to achieve a variety of vegetative goals. Whereas burning can be an effective tool to alter vegetation patterns; there are more desirable tools for most situations. The proper distribution and number of cattle (with the impact of their hooves and bodies the animal wastes they leave behind) has been shown to be an effective and long-term way to manage vegetation patterns in arid areas. The risks of cattle "getting away" as can fire are low. Cattle till the soil, breaking down "caps" that often retard reproduction of desirable plant species. Cattle fertilize the soil as they move over it (through urine and dung). Perhaps most importantly, whereas most of the primary production removed by fire goes into the atmosphere; primary production removed by cattle goes into the human food chain and provides income for people supported by the land. There are experts on using livestock to alter vegetative patterns living in your local area, so the expertise to accomplish this is not limiting. Therefore, I would urge you, regardless of which alternative plan you finally adopt, to carefully

consider the benefits of new methods of cattle grazing to accomplish your desired vegetative targets.
Thank you in advance for any consideration you give to my comments.

Sincerely,

Steven C. Amstrup

=====
Steven C. Amstrup
1112 West 15th Ave.
Anchorage Alaska 99501
samstrup2@yahoo.com
steven_amstrup@usgs.gov
SAY WHAT YOU MEAN AND TELL THE TRUTH!

 - MyJMHcmts.doc

From:
Steven C. Amstrup
1112 West 15th Ave
Anchorage, AK, 99501
907-278-9912

To:
Bureau of Land Management,
280 Highway 191 North,
Rock Springs, Wyoming, 82901

Attn: Jack Morrow Hills CAP Leader

I am writing to provide feedback on the Supplemental Draft Environmental Impact Statement (SDEIS) for the Jack Morrow Hills (JMH) Coordinated Activity Plan (CAP).

I first want to thank you for providing the public the opportunity to comment on management decisions related to our public lands. It is clear that a great deal of work went into producing this SDEIS and associated documents and you are to be commended for those efforts. The job of managing public resources is guaranteed to be difficult and BLM will never please everybody. But, of course, pleasing everybody is not the job of BLM. Rather, the job of BLM is to be the best possible steward of our public land heritage. Part of that stewardship is public participation. I hope my participation in that public process will help you achieve the most effective stewardship of the JMH area.

MY BACKGROUND

I am a PhD wildlife ecologist with 30 years experience working on topics related to energy development. I am a strong believer in multiple-use of public lands, stewardship as opposed to simple protection, and utilization of multiple management tools to achieve that stewardship. I recognize that until we make the necessary shift to an economy based upon hydrogen and other alternative energy sources, we will continue to need hydrocarbons. I believe that most hydrocarbon extraction prospects can be managed in ways that minimize impacts on other resources in the area. I also recognize that all hydrocarbon prospects are not created equal, neither in terms of their value nor in the total costs of acquiring them. I also recognize that we haven't always done well in managing hydrocarbon acquisition. My wife and I own property and plan to retire in Fremont County, just a few miles from the JMH. Because the area covered in this SDEIS is literally in my back yard, I want to do what I can to assure management there is the best it can be. The comments I provide here are my own alone, and have nothing to do with my employer or other organizations of which I may be a member.

MY CONCLUSION:

After reviewing the SDEIS, I have concluded that **Alternative #2** is the most desirable alternative action you have outlined, and I strongly urge you to implement that management strategy for JMH. Although your SDEIS suggests another alternative management plan is "preferred", I do not find your arguments, supporting preferred status of that alternative, compelling. Therefore, I urge you to adopt Alternative #2 instead. A summary of the reasons I feel this way follows.

SUPPORT FOR MY CONCLUSION

As you know, there are no longer any "non-controversial" energy developments. Our increasing and increasingly mobile human population continues to create demand for hydrocarbons at the same time that concerns about healthy landscapes and "quality of life" are escalating. As stewards of the public land heritage, you must deal with the conflicting pressures on our landscapes by considering every energy development prospect from a cost and benefit standpoint. It is important that all the costs (including possible losses of the hard to evaluate wildlife, recreation, scenic, and other quality of life values) and all the benefits be considered. It is also imperative that all the costs be considered in national as well as regional and local contexts. Hence you must look at the jobs, revenue, and hydrocarbons that could be produced under your various JMH alternatives (and the total risks of those production scenarios) in comparison to the other possible sources of hydrocarbons in Wyoming (such as the Powder River Basin CBM) and across the nation (e.g. the National Petroleum Reserve Alaska, or the Arctic National Wildlife Refuge). With such a review, some energy reserves will stand out as "crown jewels" of our energy heritage. Others will clearly be lower priority developments because of their commanding competitive values (e.g. historic, wildlife, scenic), lower energy/economic returns, or both.

In this context then, how do the 5 JMH alternatives you have outlined stand up? According to the language in the SDEIS (in quotes), the differences between the alternatives in terms of **jobs** created "would not be considered significant relative to threshold values" of the local area. The differences in **earnings** "would not be considered significant" because the annual increase in earnings from the most aggressive alternative (#1) "would be well below the significance criteria;" and the reduction in earnings from the least aggressive alternative (#2) "falls well within the threshold values." The whole range of projected **royalty and tax revenues** between the most and least aggressive alternatives was within the "established thresholds for the area." In other words, the energy and economic gains from even the most aggressive development alternative for JMH would not "significantly" affect even the local economy. The regional and national significance of the alternatives for changing the hydrocarbon extraction procedures in JMH, therefore, must also be considered "non-significant."

If the benefits to aggressive development in JMH are non-significant, what about the environmental and quality of life costs of such developments? Here, the differences between the alternatives appear to be substantial. The bottom line is that implementation of Alternative #2 would provide substantially greater protection for the areas holding the most special, unique, and sensitive values of JMH. Whereas your "preferred alternative" proposes to afford the best care of these resources through "Adaptive Management"; the uncertainty in the level and effectiveness of that management is much greater than in alternative #2. In alternative #2, the stewardship of the special and sensitive values of

JMH literally are written in black and white. In your "preferred alternative" that stewardship will be subject to the whims of: future government funding for implementation and enforcement, lawsuits and other complaints from those who will disagree about what is "adaptive", and changing philosophies of government administrators. Clearly, adaptive management must be used in most natural resource situations. Basing the whole future of the JMH on poorly defined adaptive strategies, however, does not seem optimal, in light of the presence of alternative #2. Because the energy/economic benefits of alternative #2 are, according to the SDEIS, **not "significantly different"** from the others and the potential risks/costs are greater, the choice is clear-Alternative #2 is preferred.

The choice is clearer still when the alternatives are framed in a national context. For example, the most aggressive alternative outlined for JMH would result in just over 2000 acres of surface disturbance. Coincidentally, this is approximately the amount of acreage that might be disturbed under the most recent proposal for development of the Arctic National Wildlife Refuge. That level of surface disturbance in ANWR, however, could result in access to one of the largest oil fields in North America (even if the lower interval estimate of reserves there is used). From an energy perspective, ANWR may be one of our crown jewels, but JMH clearly is not. From the standpoint of historic scenic, and environmental values, and from the standpoint of proximity to people who can travel there to enjoy those values, however, JMH is a jewel. Alternative #2 allows continued hydrocarbon exploration and development in areas of the Red Desert that have not been identified as holding exceptional non-consumptive or renewable resource values. It allows a 6-fold increase in the amount of surface disturbance (related to hydrocarbon development) during the first 20 years after implementation. Yet, alternative #2 assures protection of portions of the JMH that truly are (in terms of recreational, historic, scenic, and wildlife values) jewels of the West. Again, I urge you to adopt alternative #2 as your preferred management plan.

A COUPLE DETAILS

I do not have time to comment on the many details in the SDEIS that caught my attention. Neither do you probably have time to read them all. A couple things stood out strong enough, however, I feel compelled to express them here.

First, the SDEIS does not provide any specifics regarding the scope and nature of seismic testing. Options for such testing were mentioned, and brief descriptions of the various methods provided. But the critical information about the timing, locations, and spacing of seismic grids were not even mentioned. This is a major shortcoming in the SDEIS, and makes interpretation of the possible effects of such exploration impossible. This is particularly important when it comes to 3-D seismic testing. 3-D is a wonderful tool for outlining hydrocarbon prospects. It also is a potentially very disruptive tool to wildlife and their habitats. Without knowing exactly how and when 3-D grids will be run, the impacts cannot be projected. Some places, impacts of even 3-D testing can be ameliorated with fairly simple measures. For example, on Alaska's north slope, 3-D seismic can be conducted only in late winter and spring. At that time the only wildlife species that is likely to be affected is polar bears occupying their maternal dens. Because we have explicitly identified denning habitats and the chronology of denning, it is possible to effectively eliminate effects of 3-D by requiring that surveys in areas

including denning habitats be run later in the spring-after females and their cubs have emerged. The SDEIS offers no indications as to how these surveys would be managed in the complex mosaic of the JMH, and hence no opportunity for reviewers to interpret what is in store for the landscape or to make sensible comments. Regardless of the alternative you finally adopt, you will need a great deal of input to adaptively manage such surveys in the complex habitats of the JMH.

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Thank you in advance for any consideration you give to my comments.

Sincerely,

Steven C. Amstrup

200,212

"Dey Eileen"
<EDey@br-inc.com>
05/23/2003 03:25 PM

To: <wymail_jmhcap@blm.gov>
cc:
Subject: JMH Comments - Burlington

Please see the attached.....

<<jmhsupdraft052303.doc>>

Eileen Dey
Regulatory Compliance Supervisor
Burlington Resources Oil & Gas Co. LP
Mid-Continent Division
(915) 688-9042
(915) 688-6010 Fax

- jmhsupdraft052303.doc

[redacted]

May 23, 2003 Via Internet: wymail_jmhcap@blm.gov

Attention: Ms. Renee Dana, Team Leader
Bureau of Land Management
Rock Springs Field Office
280 Highway 191 North
Rock Springs, WY 82901-3447

Re: Comments on Supplemental Draft Environmental Impact Statement
For the Jack Morrow Hills Coordinated Activity Plan
Sweetwater, Fremont, & Sublette Counties, Wyoming

Dear Ms. Dana:

Burlington Resources Oil & Gas Company LP appreciates the opportunity to provide comments on the Supplemental Draft Environmental Impact Statement (SEIS) for the Jack Morrow Hills Coordinated Activity Plan (JMHCAP).

BR is one of the largest independent (non-integrated) oil and gas companies in the United States in terms of total domestic proved reserves. We are the lessee of approximately ten percent of the federal leases held by production and operate approximately ten percent of all wells located on federal oil and gas leases. BR, as an operator in Wyoming, understands the precedent-setting nature of this SEIS and therefore has participated throughout the NEPA process.

BR is a member of Public Lands Advocacy (PLA) and the Petroleum Association of Wyoming (PAW) and endorses both associations' comments submitted on the SEIS. The following issues continue to of concern to BR:

- **Staged Leasing:** The concept of staged leasing continues to be present in this planning effort despite previous industry comments. This concept is unnecessary, is not supported by analysis, and should be removed. Staged leasing prevents the operator from securing a viable lease block prior to development, and incorrectly presumes resource degradation as a result of leasing.
- **Adaptive Environmental Management (AEM):** BR supports the principles of adaptive environmental management, however currently in Wyoming there appear to be three different approaches employed. BLM must agree upon and utilize a single template so that interested parties have an understanding of what

the process entails. Performance-based parameters should be utilized as they encourage innovation and embrace changing conditions and new technological advancements. Monitoring must be a critical component in measuring the effectiveness of these parameters. BR recommends that AEM and the related performance-based parameters be specific enough for the project proponents to fully understand the expectations at the time of permit issuance. Unclear and unspecified parameters, mitigation and monitoring causes serious difficulties for project proponents in terms of scheduling, unanticipated costs and uncertainty.

- **Valid existing rights:** BLM must ensure that valid, existing rights are not abrogated by the supplemental draft. (They appear to be by the staged leasing proposal.)
- **National Historic Trails:** Protection measures for National Historic Trails should remain with an "avoidance area of ¼ mile on either side of the trail or visual horizon, whichever is less" until the Wyoming Trail Plan is finalized, subject to public review, and amended to the RMP.
- **Steamboat Elk Herd:** Increases in the herd objective must be based upon scientific evidence that forage in the management area can support the increase in the herd objective as well as other range resource users such as livestock grazing, other wildlife, etc. The Wyoming Game and Fish Department must implement a program for controlling the growing elk herd and bringing the elk population numbers back down to the appropriate population objective.

Again, BR appreciates your consideration of our comments. Please contact me at (915) 688-9042 should you have any questions or would like to discuss in more depth.

Sincerely,

Eileen Danni Dey
Regulatory Compliance Supervisor

200,213

"Cathy Purves" <cap@wyomingwildlife .org>
05/23/2003 04:31 PM

To: <Wymail_jmhcap@blm.gov>
cc: "Larry Beesler" <larb@wyomingwildlife.org>, "Gwyn McKee" <gwyn@vcn.com>
Subject: Wyoming Wildlife Federation COmments on JMH CAP - WWF

Hello Renee,

I have my comments attached from the Wyoming Wildlife Federation. In addition to the Comments is a table attachment which is cited within the contents of the Comments.

Thanks for the opportunity!

[redacted]
Western Field Director
Wyoming Wildlife Federation
PO Box 1387
Lander, WY 82520
307-335-8633
cap@wyomingwildlife.org

- Jack Morrow Hills comments of WWF.doc
- Red Desert Harvest.doc

WYOMING WILDLIFE FEDERATION
P.O. Box 106
Cheyenne, Wyoming 82003

May 23, 2003

Renee Dana, Team Leader
Jack Morrow Hills CAP SDEIS
280 Highway 191 North
Rock Springs, WY 82901
Email: Wymail_jmhcap@blm.gov

Re: Comments on the Supplemental Draft EIS for the JMH CAP/draft Green River RMP Amendment

Dear Ms. Dana,

Please accept the following comments on behalf of the Wyoming Wildlife Federation, Wyoming's oldest and largest sportsmen conservation group. These comments are offered for review and consideration during the development of the final JMH Coordinated Activity Plan and EIS.

While the Wyoming Wildlife Federation (WWF) submitted comments in concert with the National Wildlife Federation and the Natural Resources Defense Council, the WWF would like to submit the following additional specific economic information for consideration. The WWF feels that hunting, fishing and recreation/tourism expenditures were grossly underestimated and/or lacked thorough evaluation and consideration toward the overall economic impact in the Jack Morrow Hills area.

It is the agency's responsibility to provide a comprehensive and environmentally adequate management framework for all activities which occur in this resource area. As stated, it is your objective to determine the appropriate level and methods of ***all*** the combined land and resource uses possible. The WWF feels that adequate evaluation of economic contributions to the JMH area concentrates on mineral resources while dismissing other important and viable economic impacts as less than significant to this region and state.

In addition, the data addressed in the JMH Supplemental DEIS (2003) and the Draft EIS JHM CAP (2000) is incomplete and conflicting, significant recreation use and economic data from the northern portion of the JMH area are omitted, consumptive and non-consumptive uses are greatly distorted or not considered, and questionable economic assumptions in the economic analysis are made.

It is a known factor that hunting, recreation and tourism provide significant contributions to the economy of this state. Specifically, the JMH area provides considerable opportunities for such activities. As stated in the JMH SDEIS (*3.4.1 and 3.4.2)* Off Road Vehicle Use and Hunting are the two most popular activities which occur within the planning area. The JMH planning area provides habitat for many species of wildlife, and provides crucial wildlife habitat for elk and mule deer. The planning area also provides considerable habitat for antelope. All three of these big game species are popular game for hunters. The area also contains important breeding and rearing habitat for the Greater Sage Grouse, and is still considered a huntable game bird species by Wyoming Game and Fish. Cold water fisheries and warm water fisheries occur within this planning area but are not considered.

Economic impacts in *Table 2-4* (*Summary of Impacts*, SDEIS 2003) are not even considered for recreation, wildlife, cultural, historic trails, etc. Economic impacts are only considered for Locatable and Leasable Minerals and are only considered in terms of "adverse" (i.e., economic) impacts should mineral development ***not*** be permitted. Adverse impacts to the economies of wildlife, recreation and tourism ***with*** mineral development occurring are not considered.

Recreation Use: (non-consumption). The most glaring information presented is for recreation use estimates. The Supplemental DEIS (2003) does not distinguish between nonresidents and residents (except to say that residents make up the majority of the hunting use) while in the Draft EIS (2000) considerable information is presented between resident and non-resident recreation use, including cost per day spent by users (*Table 4-13, Economic Assumptions for Recreation).* Interestingly, the definition for resident and nonresident recreation use differs than that defined for resident and nonresident hunting value purposes. Nonresident recreation users are considered those individuals outside the region of the three county areas but can be Wyoming residents.

Equally confusing is the assumption made in the SDEIS (2003) that there is only economic impact with recreation from nonresidents in recreation use. This assumption negates the local economic impact from local recreationists who most likely live in this area because of those outdoor values, including fishing, hiking, four wheeling, etc... Keep in mind, these "residents" who are not considered to be contributing to the economy are from the three county region. .

Using the economic data presented in the DEIS (2000), in *Table 3-33 (Net Economic Value of Resident Recreation for 1998 Base Year)* resident non-consumptive use brings in an estimated $593,308 annually. By extrapolating that figure based on BLM's five and twenty-year projections, just the local economic

impact from non-consumptive recreation use can be estimated at $2,966,540 in five years and $11,866,160 for twenty years. And it has been stated in both documents that recreation use is expected to increase (2% annually stated in the DEIS 2000; and 2.5% for OHV and 2% for recreation use, SDEIS 2003). These estimates are considerably lower than that provided by the state Economic Estimates (Dept. Tourism, 2002) and by the earlier DEIS estimates. Using data which is more detailed in the 2000 DEIS, recreation is shown to contribute significantly to the local economy, irregardless of whether it is resident or nonresident specific.

For example, the BLM shows that recreation impacts are estimated to increase in recreation user days to 1.18 million recreation days over a twenty-year planning period (*page 303*; DEIS 2000). Using the figure presented in *Table 4-13* in the 2000 DEIS, $80.78 is spent per day as a total economic impact from non-consumptive recreation use. Multiply that by the 1.18 million days and the economic impact results in $95.6 million being contributed to the planning area over a twenty-year period.

And adding more mud to the economic waters, recreation use has been defined in the Draft EIS (2000) as only non-consumptive use, yet in the Supplemental Draft EIS (2003), hunting (but not fishing) has been included in the agency's analysis of recreational use and visitor days (*3.4 Recreation Resources)* but is not included in the table presented (*Table 3-18).*

Recreation visitor days are not tracked specifically for the JMH area in the SDEIS yet in the DEIS of 2000, *Table 3-27* presents direct economic impacts for a base year for the Jack Morrow Hills. And again, fishing is not considered in the economic evaluations. This is especially disconcerting since there are several fishing outfitters who use the Jack Morrow Hills area for guided fishing trips. And of the identified five streams in the area that contain fish life, four of them contain cold water trout species (*Table 3-39*; DEIS 2000). In fact, the BLM is remiss in "assuming" that very little fishing occurs in the planning area (*3.4 Recreation Resources;* SDEIS, 2003). The Rock Springs Chamber of Commerce and the Lander Chamber of Commerce have literature promoting fishing trips within the planning area. There are over 49 permittees with outfitter and guide permits granted from the Rock Springs BLM office that use this area (Rock Springs BLM personnel, May 2003). Types of permittees businesses include horse packing trips, hunting guides, goat packing, fishing guides, rock hounding, wildlife viewing guides, archeological guides, desert survival guides and general nature guides to name a few. Only hunting has been included in the economic estimates. By not including these additional important business uses and their economic

contributions to the economy of this area, the BLM greatly distorts the validity of economic evaluations in this Plan.

Hunting Use: Using the BLM's methodology for estimating economic value from hunting illustrates the serious flaws. The first flaw is discounting the economic impact that local hunters (those within the Rock Springs area and the three county regions) have toward the economy. Hunting is a business in this state and has been totally dismissed as such. Hunters (within the three county region) who purchase hunting supplies, gas, motels, taxidermists, etc. from local hunting or sports-oriented retail businesses or use the services of professional guides and outfitters located within the three county area contribute to the local economy as well as the state's economic profile. Outfitter expenditures have been totally disregarded and should be included in this economic profile.

When comparing hunting expenditures, residents and nonresidents are distinguished by their state residency (Wyoming Game and Fish Department) data) in the planning area of the DEIS (2000) but in the 2003 SDEIS, residents are identified by their locale within the three county area. Anyone living outside the three county areas but who are state residents are not considered in the economic statistics. WWF received a hunter list (February 2003) from the Wyoming Game and Fish Department which identified 5,000 hunters who had hunted within the planning area in 2002 and included numerous residents outside of the three county area.

Inconsistency in evaluating economic data is of concern to the WWF. In the DEIS of 2000 data is presented in *Table 4-13* which reflects how much hunters paid per day to hunt and recreate and in *Table 4-14*, hunting days were estimated among residents and nonresidents. Expenditures in *Table 4-13* were assumed for both residents and nonresidents to be the same. This is inconsistent with supplemental data presented in the 2003 SDEIS.

In another example, in *Table 4-13* of the DEIS (2000), it is estimated that a nonresident elk hunter spends $330.69 per day to hunt elk in the planning area. In *Table 4-14*, hunting days for nonresidents totaled 9,589 for the *Short-term Cumulative Outputs* over a five-year period under the Preferred Alternative. This results in nonresident elk hunters contributing $3,170,986.41 to the economy of the area over a five-year period. Over the estimated twenty-year planning period, the economic contribution from elk hunters increases to $6,306,258.30 (based on an estimated 19,070 hunting days). This appears to be in direct conflict with estimates received from the Wyoming Game and Fish Department (see *Harvest and Hunter Expenditure Attachment*). For the year 2001, there

were a total of 2,119 hunter days. Using BLM's methodology and multiplying that by 5 years, a total of 10,595 days were spent hunting.

A resident hunter, while discounted as contributing to the economy of the area, does indeed contribute to the economic viability of the region. In fact, according to *Table 4-14* in the 2000 DEIS, residents spend three times as many days out hunting than nonresidents. While the DEIS does not present data on how much a resident hunter spends per day hunting elk, *Table 4-13* does present the *Net Economic Value* of a resident elk hunter as $41.46. Over a five-year period where 36,140 days were estimated to have been used locally by residents, an estimated $1,498,364.40 was spent. Over a twenty-year period (*Table 4-16*; DEIS, 2000) $2,972,101.56 is estimated to be contributed by residents. This figure seems out of proportion considering that recreation and hunting days were estimated to increase over the twenty-year period. Determining the number of recreation or hunting days needs to be better reviewed in lieu of statements that are made within the context of the document.

The Attachment presented with this letter illustrates data received on hunting expenditures from the Wyoming Game and Fish Department, based on the years 2000 and 2001. The differences between what BLM has derived (using the WGFD data) and what the WGFD presents is confusing. Even taking the percentage of hunters in the planning area as cited by BLM, the attached table would still reflect higher expenditures. In fact, for the year 2000, it has been estimated that $3.9 million was spent by hunters in the Red Desert/Jack Morrow Hills area, and that number includes sage grouse hunters—something that the SDEIS does not consider. In 2001, $2.6 million was spent by hunters. These are significant numbers and need to be realized.

And finally, the lack of additional economic information from the adjoining and participating counties (Fremont and Sublette) is irresponsible. Livestock auctions and implement dealers are not the only economic contributors to the planning area from these counties.

For these reasons, the Wyoming Wildlife Federation feels that the BLM economic figures fail to adequately evaluate and realistically consider the additional and equally important economic participants who impact the planning area.

Based on the data presented in the JMH DEIS of 2000 and the SDEIS of 2003, the economic contributions to the region from hunting and recreational opportunities compare significantly with the mineral industry and far surpass the livestock industry. It is time that the BLM consider all economic impacts of this multiple use area.

Thank you for considering these comments.

Sincerely,

Cathy Purves
Western Field Director
Wyoming Wildlife Federation
P.O. Box 1387
Lander, WY 82520
307-335-8633
cap@wyomingwildlife.com

Attachment: Red Desert Estimated Harvest & Hunter Expenditures...

Red Desert Estimated Harvest & Hunter Expenditure Information for Big Game and Sage Grouse Species 2000 and 2001 data

SPECIES	HERD UNIT	HUNT AREA	# HARVESTED		# HUNTERS		$ EXPENDITURES	
			2000	2001	2000	2001	2000	2001
Antelope	Red Desert (#615)	Table Rock (#60)	120	64	118	77	$ 130,200	$ 77,888
		Chain Lakes (#61)	298	162	338	196	323,330	197,154
	Sublette (#40)	Steamboat (#92)	961	358	1,149	433	$ 1,049,195	$ 435,686
Mule Deer	Steamboat (#430)	Steamboat (#131)	295	263	862	838	$ 813,610	$ 622,784
	Chain Lakes ((#650)	Chain Lakes (#98)	41	50	120	116	$ 113,078	$ 118,400
Elk	Steamboat (#426)	Steamboat (#100)	292	311	348	378	$ 1,111,936	$ 961,923
	Shamrock (#643)	Shamrock (#118)	55	45	110	81	$ 209,440	$ 139,185
Subtotals					**3,045**	**2,119**	**$ 3,750,789**	**$2,553,020**
Sage Grouse	Red Desert (#9)	Red Desert (#9)	1,144	581	327	194	$ 147,576	$ 79,597
TOTALS					**3,372**	**2,313**	**$ 3,898,365**	**$2,632,617**

*Data taken from Wyoming Game & Fish Department's 2000, 2001 Annual Report and 2000 & 2001 Harvest Reports

($3.9 million $2.6 million)

200,218

"emaxon"
<emaxon@attbi.com>
05/23/2003 06:17 PM

To: <wymail_jmhcap@blm.gov>
cc:
Subject: jack morrow hills comment - North American Pronghorn Foundation

Dear Ms. Dana
Attached please find our comments regarding this
DEIS, which has the potential to have an extremely significant impact on one of the world's largest pronghorn populations.

Thank you,
Robb Hitchcock
President, NAPF

- jackmorrowhillsdeis.doc

- jackmorrowhillsdeis23.doc

Ms. Renee Dana, Team Manager
Bureau of Land Management
Rock Springs Field Office
280 Highway 191
North Rock Springs, Wyoming 82901

Re: Comments on Jack Morrow Hills DEIS

Dear Ms. Dana:

Pursuant to requests for comments regarding the Jack Morrow Hills DEIS, the North American Pronghorn Foundation, a not-for-profit conservation organization does hereby wish to forward the following recommendations and additions for inclusion:

1) Enlarge the consideration of the cumulative impact that such an extensive development of the various extractive industries, i.e., oil and gas, mineral mining, etc, as well as the other extraneous activities, i.e., pipeline and well inspections, increased human traffic, infrastructure obstacles, etc., will invariably have on the indigenous native species, in particular, the pronghorn antelope, which to this juncture have not been adequately addressed. Studies to be funded by operators.

2) With respect to the first recommendation, baseline data on those areas crucial to pronghorn, i.e. , fawning areas, summer and winter ranges, movement corridors, movement barriers, water resources, etc., should be gathered so as to define these areas and provide for their protection and or mitigation prior to the issuance of any additional leases, developments and or road building. Without identifying such areas prior to any additional leasing or other development they cannot be adequately protected nor can they be satisfactorily mitigated after the fact, i.e. "baseline data".

3) Long term range and game management goals are not clearly delineated for this development area in the DE IS, nor are mitigations outlined to repair or enhance areas that will be impacted thereby. Before additional leasing is allowed, these plans need to be developed and presented for review by federal wildlife management agencies and corresponding state game and fish departments.

4) Man-made artificial barriers, i.e., highways, roads, pipelines, fencing, etc., have the effect of fracturing habitat and altering natural movement corridors, almost always to the detriment of the species involved, and this is especially evident with pronghorn. As such, the likely construction of extensive networks of roads linking well sites and the fences which often accompany same pose a great threat to pronghorn if they adversely affect or compromise crucial winter or summer range, fawning areas, or movement corridors.

5) As such, the NAPF would recommend the use of "permissive" fencing if any be required, i.e., fences which allow animal passage, rather than "non-permissive" fencing, i.e., net wire or too high, in all fencing that may be utilized. And further, would

recommend that existing fences in the DEIS area be modified to BLM standards for fencing, wherein a smooth wire is used on the bottom strand not to be lower than 9 inches from the ground, and no net wire fence be used at any location in the area.

6) We endorse the concept of "Development Corridors" which would consolidate the various roads, pipelines, power lines, etc., into narrow right-of ways and thus minimize the types of habitat fracturing and movement barricades alluded to heretofore.

7) The density of wells is directly proportional to the total habitat disturbed, and hence we would suggest low densities to minimize the impact of a well site on any given parcel, thus reducing the adverse effects on the resident pronghorn. The use of lateral drilling has also been shown to minimize the necessity of additional well sites.

8) The establishment of a monitoring team composed of various federal oversight agencies, state fish and game department, state DEQ, conservation organizations, and other legitimate stakeholders should be undertaken immediately to track compliance with BLM standards, habitat mitigation, environmental effects, game impacts, etc.

9) Vehicular access via newly established roads has been demonstrated to cause dislocations of pronghorn and an increase in harassment and poaching incidents. We would therefore recommend that new roads be abandoned or consolidated after well sites have been connected to pipelines and their use be limited to maintenance or monitoring operations and legitimate use by legal /sportsmen and other recreational users on certain designated roadways.

10) Surface water produced by CBM development that cannot be re-injected should be stored for wildlife use, assuming that the quality of such water is potable and not prohibitively saline, and reclaimed lands seeded with high forbe/shrub mixture.

11) Grazing permits should be maintained at the current level and not allowed to return to the maximum allowable AUMs until the impact of these extractive industries can be determined as to their adverse effect on wildlife populations.

12) In evaluating impacts, we would endorse the Wyoming Standards for Healthy Rangelands, Appendix 10, the Wyoming Game and Fish Department mitigation policy, and the Guidelines for Livestock Grazing.

With respect to management strategies to be employed to mitigate the impacts of a development of this scale, we would suggest that the following publications be used as reference materials: a) Krausman, R. , editor. 1995. Rangeland wildlife. Society for Range Management, Denver, Co.440pp. ISBN1 -884930-05-0, b) Lee, R.M. , J.D. Yoakum, B.W. O'Gara, T.M. Pojar and R.A. Ockenfels, editors. 1998. Pronghorn management guides. Pronghorn Antelope Workshop, Prescott, Az. 110pp, c) Demaris, S. and P.R. Krausman, editors. 2000. Ecology and management of large mammals in North America. Prentice Hall. Upper Saddle River, N.J. , USA. 778pp. ISBN 0-13-717422-5.

With respect to specific language in the document, the NAPF contends that the following corrections and additions be added:

1) Section 4.4.6 Impacts on Wildlife: "Long-term displacement of elk, (addition: pronghorn,) or deer, from crucial habitat or birthing areas within the planning area would be considered significant."
2) Next to last sentence in fourth paragraph on page 4-64: " Seclusion areas for wildlife would become smaller and more dispersed in some areas. Increased oil and gas activity , especially in areas with reduced well spacing (40 and 80 acre spacing) would preclude use of some of these areas by wildlife species, especially deer, (addition: pronghorn), and elk".

3) Last paragraph fourth sentence on page 4-85: "Should development be concentrated within the high development potential area which includes the core area, adverse effects to the elk (addition: and pronghorn) herds would be greater than if development were dispersed because the majority of the high development potential area overlaps big game crucial habitat and birthing areas".

The N.A.P.F. welcomes this opportunity to comment on this important large scale DE IS and urges you to give due consideration to the comments included herein. In light of the possible adverse impact of such additional development, we would urge that the BLM adopt Alternative 3 until such studies are completed. We welcome the chance to participate or assist in the revision of this DEIS and would appreciate being included as a listed "stakeholder" for the purpose of receiving information regarding the final DEIS. While we do not oppose the concept of the development in certain areas of the Jack Morrow Hills, we believe that its planning is inadequate. Thank you, and please do not hesitate to contact this office for further comment.

Sincerely yours,

Robb D. Hitchcock
President, NAPF
P.O. Box 1383
Rawlins, Wyoming
82301

200,223

PLA
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05/23/2003 08:56 PM
Please respond to pla

To: Wymail_jmhcap@blm.gov
cc:
Subject: Comments on JMHCAP SDEIS - Claire Moseley

Attached are [redacted]'s comments on the Jack Morrow Hills Supplemental Draft Environmental Impact Statement. Please contact me if there is a problem with transmission.

Thank you.

Claire M. Moseley
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May 23, 2003

Ms. Renee Dana, Team Leader
Bureau of Land Management
280 Highway 191 North
Rock Springs, WY 82901

Re: Supplemental DEIS for the Jack Morrow Hills Coordinated Activity Plan and Draft Green River Resource Management Plan Amendment

Dear Renee:

On behalf of Public Lands Advocacy (PLA), following are comments on the subject supplemental draft environmental impact statement (SDEIS). PLA is a nonprofit trade association whose members include independent and major oil and gas producers as well as nonprofit trade and professional organizations that have joined together to foster environmentally sound exploration and production on public lands. As expressed at the April public hearing in Rock Springs, PLA has serious concerns regarding the preferred alternative identified in the SDEIS. These concerns are iterated below.

Adaptive Management

PLA objects to the staged leasing and development proposal contained in the preferred alternative. While BLM refers to this as "adaptive management," it appears to be a ploy to further undermine the development of the Jack Morrow Hills study area. Despite years of planning in this area, BLM is still unwilling to make appropriate land use decisions. Furthermore, the concept of adaptive management was never intended to be used as a means to avoid making land use decisions. Instead, it is meant to provide land managers with flexibility while allowing land uses, including oil and gas development, to proceed without unnecessary delays. Such flexibility would be accomplished through the use of performance standards rather than highly prescriptive mitigation or limits on activity.

According to the Council on Environmental Quality (CEQ), adaptive management is a process that should be used to evaluate the effectiveness of certain assumptions by experimentally comparing different management practices. In fact, it is intended for agencies such as BLM to deal with uncertainties related to the effectiveness of prescribed mitigation measures by identifying causes and effects of management decisions through monitoring. Information derived from monitoring would provide BLM cause for adjusting its management approach through consultation with the land user. All changes in management must be contingent upon valid existing lease rights. That is not to say, however, that BLM cannot work with operators in order to arrive at mutually agreeable solutions to problems. In a nutshell, adaptive management is intended to allow the agency to permit certain activities to occur while monitoring their effects and making adjustments accordingly rather than relying on inexact guesses as to what could occur as a result groundless suppositions.

Ms. Renee Dana
Team Leader, JMHCAP
May 23, 2003

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One of our greatest concerns is that BLM's plan contains no assurances of funding its purported monitoring. Without full funding, staffing and specific objectives, all attempts at developing a reasonable adaptive management process are destined for failure. These failures will not only jeopardize BLM's management plans, they will cause serious delays and needless constraints on multiple use activities, such as development of energy resources.

Staged Leasing

Staged leasing is not adaptive management. Moreover, it is certainly unwarranted given the fact that BLM has failed to identify specific goals and objectives with respect to what it wants to accomplish by this untenable management approach. One stated rationale for proposing staged leasing is to protect the Steamboat desert elk herd. The proposed plan is clearly extreme because the herd has continued to thrive in the area, despite the drilling of approximately 300 wells in the past. In fact the herd has flourished to the extent that the Wyoming Game and Fish Department (WGFD) has indicated its intention to increase the original target population from 500 to 1,200. Ironically, PLA understands that the herd actually exceeds 1,200 and is closer to 2000 to 2,500 head. Clearly, oil and gas development has had absolutely NO impact on the elk. We urge BLM to revise its proposal by taking in account the favorable condition of the herd.

It is irresponsible for BLM to devise a plan that will prevent a lessee from acquiring the lease block required for sufficient development of the resource. Plainly stated, staged leasing will dissuade most companies from devoting their limited exploration capital to an area which may have potential for development when no plans for development can be finalized. Even more irresponsible is for BLM to propose such a plan when there are no specific targets identified which will allow the agency to make reasonable decisions.

Reclamation/Lease Suspensions

In addition, BLM indicates that complete reclamation will be required on disturbed areas prior to issuing new leases, lifting suspensions on existing leases, or allowing development to occur in other areas. The requirement of full reclamation before allowing new activity to occur is unreasonable given the facts that all disturbed areas are subject to reclamation bonds that dictate the terms of reclamation and that the bonds will not be released until satisfactory reclamation is achieved.

Leases in the JMH area have been in suspense for years, ostensibly to allow BLM to conduct its planning analysis. It was industry's understanding that these suspensions would be lifted once BLM's management strategy was adopted. It is our contention that lease suspensions are intended for use in rare, extreme situations and not for use in perpetuity. Despite the claims of some people, JMH is hardly rare and it does not warrant extreme measures such as interminable lease suspensions! BLM needs to revise its lease management strategy.

Recreation Uses

It is counterproductive for BLM to impose inordinate restrictions on the oil and gas industry while ignoring the broad negative impacts often associated with unconstrained recreation activities. BLM is demonstrating prejudice toward oil and gas activities that are already highly regulated to ensure they are conducted in an environmentally sound manner. The same is not true for many

recreation activities. We strongly recommend that BLM reconsider its management proposal for JMH to ensure equitable management of all resource uses and activities.

Geophysical Activities

The proposed restrictions on geophysical activities are also extreme. Evidently, BLM is attempting to placate special interest groups by subjecting geophysical activities to the same restrictions imposed on off-highway vehicle use. PLA reminds BLM that seismic activities in this area leave no long-term impacts. In fact, BLM's 3150 Manual compels operators to prepare a site-specific mitigation/operating plan before beginning seismic operations. Therefore, it is unwarranted for BLM to limit a use that is subject to myriad rules and regulations and a permitting process in the same manner as a use that is not subject to the same requirements. We strongly recommend that BLM revise its proposed management of geophysical activities, taking into account the limitations already enforced.

National Historic Trails

We are gravely disturbed that BLM proposes to employ a 3-mile buffer zone along each side of National Historic Trails in the JMH area to protect the viewshed. Obviously less restrictive measures would ensure protection of these trails. There needs to be a balance between what is needed and what maybe wanted. It hardly seems reasonable to allow trails to be utilized by recreational users while limiting activities as far as 3 miles away. Ironically, these trails were forged to open up the West, not to limit activities. It is PLA's recommendation that BLM retain the ¼ mile or line-of-sight (which ever is less) outlined in the Green River Resource Management Plan.

Conclusion

It is evident that BLM is under the impression that the JMHCAP study area is still a candidate for additional wilderness designations beyond those identified by BLM during its Wilderness Study Process. According to a recent fact sheet posted on the Department of Interior web site, "the Department's internal legal analysis indicates that Sections 201 and 202 [of the Federal Land Policy and Management Act] may not be used as surrogates for Section 603 wilderness recommendations. Because wilderness designation, as a practical matter, permanently bars most use or access to these lands, Congress has reserved to itself the ability to designate wilderness areas. No administrative agency has the power to create a wilderness area by itself." Moreover, the Department found that "The Wilderness Handbook" and related BLM guidance was inconsistent with law and withdrew the Handbook and modified the related guidance. The Department also found that "The Wilderness Handbook" disregarded BLM's exhaustive fifteen-year review and that "Wilderness Areas" are managed, by law, for a single and statutory exclusionary use, and that any administrative decision to manage other lands as "Wilderness Areas" outside of the 1964 Wilderness Act, violates clear congressional direction. PLA contends that BLM is attempting to manage the JMH area as nearly as possible to a de facto wilderness despite the fact that no wilderness recommendations were made in the SDEIS.

Ms. Renee Dana
Team Leader, JMHCAP
May 23, 2003

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In view of the concerns raised with respect to the SDEIS, PLA finds it impossible to support the preferred alternative. Additionally, have found that the remaining alternatives are equally onerous. Therefore, we recommend that BLM return to the "drawing board" in an attempt to devise a much more reasonable management proposal for the JMH area.

Thank you for the opportunity to provide you with our views. Please do not hesitate to contact me should you have any questions regarding these comments.

Sincerely,

/s/ Claire Moseley

Claire M. Moseley

Cc: Gail Norton, Secretary of Interior
Kathleen Clarke, BLM Director
Bob Bennett, WY BLM State Director
Wyoming Congressional Delegation